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Attorneys for Defendants

JPMORGAN CHASE BANK, N.A., individually and as acquirer of certain assets and liabilities
of Washington Mutual Bank from the Federal Deposit Insurance Corporation, acting as the
receiver

SUPERIOR COURT OF CALIFORNIA

NORTHERN DISTRICT OF CALIFORNIA

IGNACIO ALFARO, an individual
Plaintiff,

vs.

WASHINGTON MUTUAL BANK now doing
business as JP MORGAN CHASE BANK,
N.A. a corporation and DOES 1 through 50,
inclusive,

Defendants

Case No.: 3:11-cv-06385

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND MEDIATION
DEADLINE**

STIPULATION

Plaintiff Ignacio Alfaro and Defendant JPMorgan Chase Bank, N.A., individually and as acquirer of certain assets and liabilities of Washington Mutual Bank from the Federal Deposit Insurance Corporation, as the receiver (“Defendant”) (collectively, the “parties”), by and through their respective counsel of record, hereby stipulate and agree as follows and respectfully request that the Court approve and give effect to their stipulation:

- 1) The parties wish to stay all proceedings in this matter, including hearings, briefings, appearances and any other deadlines imposed by law or the Court, pending a determination by Defendant of Plaintiff’s suitability for loan modification, which is economically and judicially efficient. Plaintiff understands that Defendant has made no guarantee that Plaintiff will be granted a loan modification and that Defendant is under no obligation to provide Plaintiff with a loan modification;
- 2) The parties further stipulate and agree that, in the event Plaintiff is denied for a loan modification, this stay shall be lifted immediately and Defendant’s Motion to Dismiss Plaintiff’s Complaint, filed on December 22, 2011, shall be rescheduled for hearing by the Court on a date and time to be determined by the Court;
- 3) The parties stipulate and agree that, although the parties are determining the date of the mediation, it will tentatively be held on January 31, 2013, at 10:00 a.m.; and
- 4) The parties stipulate and agree to extend the mediation deadline to February 7, 2013.

IT IS SO STIPULATED.

DATED: November 1, 2012

LAW OFFICE OF WENDELL J. JONES

By: /s/ Wendell J. Jones
Wendell J. Jones

Attorney for Plaintiff
IGNACIO ALFARO

1 DATED: November 1, 2012

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2
3 Daniel Rockey
4 Goli Mahdavi
5 David A. Owens

6 By: /s/ David A. Owens
7 David A. Owens

8 Attorneys for Defendant
9 JPMORGAN CHASE BANK, N.A.,
10 individually and as acquirer of certain assets
11 and liabilities of Washington Mutual Bank
12 from the Federal Deposit Insurance
13 Corporation, acting as receiver
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~~—[PROPOSED]~~ ORDER

Pursuant to the Stipulation to Extend the Mediation Deadline,

IT IS HEREBY ORDERED THAT:

1. All matters in this action are hereby stayed pending a determination by Defendant of Plaintiff's suitability for loan modification;

2. In the event that Defendant determines that Plaintiff is denied for a loan modification, the stay shall be lifted immediately and Defendants' Motion to Dismiss Plaintiff's Complaint, filed on December 22, 2011, shall be rescheduled for hearing by the Court on a date and time to be determined by the Court;

3. The mediation deadline shall be extended until February 7, 2013.

Date: November 1, 2012

